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Via ECF Filing

March 2, 2015

Honorable Analisa Torres
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: XL Specialty Insurance Company v. Lakian, et al.
Case No. 14-cv-5225

Dear Judge Torres:

We represent Kobre & Kim, LLP ("K&K"), a defendant and counterclaim-plaintiff in the above-referenced case. In light of ongoing settlement discussions among the remaining parties in the case which may obviate the need to burden the Court or the parties, we write to request the extension of certain deadlines.

K&K served counterclaims on plaintiff and counterclaim-defendant XL Specialty Insurance Company ("XL") on February 12, 2015. XL on February 26, 2015 sent the undersigned a pre-motion letter, to which K&K's response is now due on March 5, 2015, pursuant to your Honor's Individual Practices Civil Rules. XL's response to K&K's counterclaims is now due on March 9, 2015.

We request a 28-day extension of time for these responses, extending the time for XL's response to K&K's counterclaim to April 6, 2015, and extending the time for K&K's response to XL's pre-motion letter to April 2, 2015.

There has been no previous request to extend these response times. Counsel for XL has informed me that it consents to this request.

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Thank you for your attention to this matter.

Respectfully yours,

/s/ Edward J. Stein

Edward J. Stein

cc: Hon. Analisa Torres (Torres_NYSDChambers@nysd.uscourts.gov)
All Counsel of Record (via ECF)